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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JANONE INC. f/k/a APPLIANCE
RECYCLING CENTERS OF AMERICA,
INC., a Nevada Corporation,

Plaintiff,

vs.

GREAT AMERICAN INSURANCE
COMPANY and ENDURANCE
AMERICAN INSURANCE COMPANY,

Defendants

Case No. 2:21-cv-01554-JCM-NJK

**JOINT STIPULATION FOR
EXTENSION OF TIME TO RESPOND
TO GREAT AMERICAN'S MOTION
FOR SUMMARY JUDGMENT
(First Request)**

Plaintiff JanOne, Inc. ("JanOne"), and Defendant Great American Insurance Company ("Great American"), by and through their counsel, and pursuant to Federal Rules of Civil Procedure 6, 29, 33, 34 and 36, and LR IA 6-1 and 6-2 and LR 7-1, file this first stipulation for an extension of time to November 2, 2022 for JanOne to respond to Great American's Motion for Summary Judgment [Doc. 32], as follows:

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1 1. Pursuant to LR IA 6-1 (a), this is the first stipulation for the extension of time of
2 the deadline for JanOne to respond to Great American's Motion for Summary Judgment. [Doc.
3 32].

4 2. On September 21, 2022, Great American filed a Motion for Summary Judgment or
5 in the Alternative for Summary Adjudication of Issues in its favor. [Doc. 32.]

6 3. Pursuant to LR IA 7-2(b), JanOne's Response to Great American's Motion for
7 Summary Judgment is due on or before October 12, 2022.

8 4. Pursuant to Federal Rule of Civil Procedure 6(b), the Court may, for good cause,
9 extend the time for any act that is required to be done within a specified time, "with or without a
10 motion or notice...if a request is made, before the original time or its extension expires." Fed. R.
11 Civ. P. 6(b)(1)(A).

12 5. Pursuant to Fed. R. Civ. P. 29 and LR IA 6-1 and 6-2 and LR 7-1, the parties hereby
13 stipulate to an extension of time for JanOne to respond to Great American's Motion for Summary
14 Judgment.

15 6. JanOne and Great American hereby stipulate that JanOne will be permitted an
16 extension of time to November 2, 2022, to respond to Great American's Motion for Summary
17 Judgment. [Doc. 32.]

18 7. This stipulation for extension of time is being filed before the expiration of the
19 period originally prescribed for JanOne to respond to Great American's Motion for Summary
20 Judgment.

21 8. This stipulation is not intended to delay the proceedings, and will not prejudice any
22 party. Rather, this stipulation is intended to allow JanOne adequate time to respond to Great
23 American's Motion for Summary Judgment.

24 9. This stipulation is signed by counsel for all current parties to this action.
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10. The parties request that, pursuant to this Stipulation for Extension of Time, the Court enter an order authorizing JanOne an extension of time to November 2, 2022 to respond to Great American's Motion for Summary Judgment.

WHEREFORE, Plaintiff JanOne, Inc. and Defendant Great American Insurance Company stipulate to an extension of time to November 2, 2022, for JanOne to respond to Great American's Motion for Summary Judgment, [Doc. 32], request that the Court enter an order to that effect, and for such other and further relief as the Court deems just and proper.

Dated: October 12, 2022

IT IS SO ORDERED:

DATED October 12, 2022.


U.S. DISTRICT JUDGE

PLAINTIFF JANONE, INC.

**DEFENDANT GREAT AMERICAN
INSURANCE COMPANY**

/s/ Blake A. Roter

/s/ David S. Blau

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